

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

*Matthew Rowenhorst v. Islamic Republic of Iran*, No. 1:18-cv-12387 (GBD) (SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF PLAINTIFFS’  
MOTION FOR CORRECTIONS TO ORDER OF JUDGMENT**

Jerry S. Goldman, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Rowenhorst* plaintiffs in the above-captioned litigation, and I submit this declaration in support of the *Rowenhorst* plaintiffs’ Rule 60(a) Motion for Corrections to Order of Partial Final Default Judgments against the Islamic Republic of Iran at ECF No. 7521.

2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm’s representation of the *Rowenhorst* plaintiffs in connection with the September 11, 2001 terror attacks, other court records relating to the multi-district litigation to which the *Rowenhorst* plaintiffs are parties, conversations had with family members to the *Rowenhorst* plaintiffs, file records, and conversations with counsel to other September 11<sup>th</sup> plaintiffs.

3. Plaintiffs submit this Rule 60(a) Motion for Corrections to Order of Partial Final Default Judgments in light of our becoming aware that Wesley Graf received a judgment against the Islamic Republic of Iran (“Iran”) on January 4, 2022 at ECF No. 7521 and a separate judgment against Iran on January 4, 2022 at ECF No. 7522.

4. An administrative error resulted in Wesley Graf being included on two separate motions for judgment.

5. The correction requested by Plaintiffs is clerical in nature, does not raise issues with the substantive judgment contained in ECF No. 7521, and will not in any way change the Court's disposition.

6. For the foregoing reasons, plaintiffs respectfully request that the Court vacate the judgment for Wesley Graf at ECF No. 7521 and that the Clerk remove Wesley Graf from the Judgment Index for the judgment granted at ECF No. 7521.

Dated: New York, New York  
April 25, 2022

/s/ Jerry S. Goldman  
Jerry S. Goldman, Esq.